Submitted via Electronic Comment Filing System (ECFS)

July 31, 2006

Ms. Gina Spade
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Comment on 02-6 - Data Recovery - Tape Backup

Ms. Spade:

As a SPIN provider with a heavy pre-erate and current K-12 history, we believe sufficient warrant exists to expand the narrative dealing with DATA RESTORATION AND BACKUP capabilities.

The current eligibility allows only tape modality and further requires tape hardware be directly connected to an eligible server. This limitation presents several substantial problems, including but not limited to the following:

1. Backup equipment proximal to a mission critical server demands an industry standard rotation, removal and retention scheme, including daily removal to offsite storage. In our K-12 experience, we can promise you this does not happen with even nominal regularity.

2. On the rare occasion when removal to offsite storage does occur, the offsite storage location is rarely secure or private. More often than not, sensitive data concerning minor children is relocated to an employee home or vehicle, where it is a prime target for damage, loss or theft.

3. Magnetic tape storage in general and specifically as a singular storage modality is rapidly losing acceptance in the IT industry. The equipment and/or media are less reliable and less cost-effective than other options such as disk drives, optical storage devices, and online backup.

4. Restoration of magnetic tape requires proprietary hardware availability. In a crisis event, particularly a natural disaster such as hurricane Katrina, hardware is seldom salvageable. Replacement hardware can involve long shipping delays, numerous compatibility issues, and reinstallation/reconfiguration obstacles.

5. In the most rural K12 organizations with the smallest staff, tape backup logs go days, weeks or even months without review. If the IT employee is out for an extended period of time due to injury, maternity leave, or other unplanned leave, school districts may incur significant risk of failure and data loss.

We believe these and other risks can be effectively mitigated by enlarging the eligibility definition to include service modalities such as SAN storage techniques and online backup services. Geographically dispersed backup methods (e.g. online remote backup) have the following unique advantages in addressing the list of deficiencies sited above:

1. Using online remote backup, rotation and retention is automated and can be matched to address specific risk. Full images of mission critical servers can be retained for 30, 60, 90 days. eMAIL correspondence can be tracked months retrospectively and by unique thread. Archives are fully offsite and available via the internet from any internet-capable network "hot site".

2. Online remote backup services frequently carry HIPPA or SOX certification. Many such services are commonly used by security-sensitive facets of the federal government, banking, and healthcare industries. Security and redundancy at these facilities is absolutely state-of-the-art.

3. Online remote backup is an effective solution as both a primary or secondary method in a systematic backup scheme. Services can easily match the 3-year ROI for a local multi-tape system with media.

4. Online remote backup requires no proprietary hardware installation to facilitate restoration. To reload a server, one need only access an internet connection, install the client software, provide the security

clearance, and restore. As noted previously, restoration using this method involves no geographic restriction.

5. Online remote backup typically includes automated notification such as email, text paging, text messaging and other communication to ensure backup anomalies do not go unnoticed. With appropriate server access, a secondary provider can affect a real-time, remote backup of affected file(s) in the absence of the primary IT manager.

We believe the FCC will agree that protecting, securing, and validating the data of minor-aged public school children is no less important than backing up an online checkbook. In the years since the USAC/FCC initiated E-Rate, the K12 school system has seen an exponential increase in its dependence on core student and governmental electronic information. With this increase, the schools have also seen an exponential increase in risk and exposure to crisis data events. We believe this expansion of backup eligibility is necessary to both acknowledge the increased risk/reliance and reinforce the FCC's expectation that public schools take advantage of the best available methods to safeguard our nation's academic and individual information.

Please do not hesitate to contact us if we can provide additional information. Thank you for your attention to this matter.

G. Kevin Roper, MBA
ComputerLand Network Technologies of East Texas

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